## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	CRIMINAL NO. 1:11-cr-554 (TSE)
JUBAIR AHMAD,	)	
	)	
Defendant.	)	

## Government's Reply to Motion for Return of Property under FRCrP 41(g)

Defendant Jubair Ahmad has filed a motion for return of seized property, to include his passport. (Dkt. 66). The government has no objection to returning the defendant's property, and will ensure that such property is returned to the defendant's family. However, the government does not have an exact timeline as to when that will happen. With required social distancing and teleworking due to the Coronavirus, it will likely take longer than normal to have FBI personnel who can identify, locate and return defendant's property. Nonetheless, the defendant's release date is not until February 2022, and the government will endeavor to have it returned well before then.

Respectfully submitted,

G. Zachary Terwilliger United States Attorney

By:	/s/

John T. Gibbs Virginia Bar No. 40380 Assistant United States Attorney United States Attorney's Office 2100 Jamieson Avenue Alexandria, Virginia 22314
Office: (703) 299-3700
Fax: (703) 299-3980
Email: john.gibbs@usdoj.gov

## **Certificate of Service**

I certify that on April 14, 2020, I electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system. I also directed that a copy of this filing be mailed to:

Jubair Ahmad 79017-083 Unit EB Sea-Tac Federal Detention Center P.O. Box 13900 Seattle, WA 98198

By: /s/

John T. Gibbs Assistant United States Attorney United States Attorney's Office 2100 Jamieson Avenue Alexandria, Virginia 22314

Office: (703) 299-3700 Fax: (703) 299-3980 Email: john.gibbs@usdoj.gov